

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SOUTH KENTUCKY RURAL	)	
ELECTRIC COOPERATIVE CORPORATION	)	CASE NO.
FOR APPROVAL OF MASTER POWER	)	2018-00050
PURCHASE AND SALE AGREEMENT AND	)	
TRANSACTIONS THEREUNDER	)	

COMMISSION STAFF'S FIRST POSTHEARING REQUEST FOR INFORMATION TO  
SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

South Kentucky Rural Electric Cooperative Corporation ("South Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before May 29, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

South Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which South

Kentucky fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, South Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that the July 23, 2015 Memorandum of Understanding (“MOU”) between East Kentucky Power Cooperative, Inc. (“EKPC”) and EKPC Member Distribution Cooperatives was not submitted to Rural Utilities’ Service (“RUS”) for approval or, if the MOU was submitted to RUS for approval, provide a copy of RUS’s approval or rejection of the MOU.

2. Provide a supplemental response to Commission Staff’s First Request for Information, Item 13, that includes all costs and liabilities, other than the actual costs of purchasing energy and capacity, that South Kentucky could incur as a result of becoming a PJM Interconnection LLC (“PJM”) member and purchasing energy and capacity from PJM.

3. Refer to the Rebuttal Testimony of Carter Babbitt, page 15, lines 12—17. Provide the Net Present Value analysis containing the four changes in assumptions in Excel spreadsheet format with all cells and formulas unprotected and readily accessible.

4. Provide a copy of EnerVision, Inc.'s May 10, 2018 presentation to South Kentucky's Board of Directors that Mr. Babbitt referenced in his testimony at the May 15 — 17, 2018 hearing in this matter.



---

Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED     **MAY 21 2018**    

cc: Parties of Record

\*Big Sandy R.E.C.C.  
Big Sandy R.E.C.C.  
504 11th Street  
Paintsville, KY 41240

\*David T Royse  
Attorney At Law  
Ransdell Roach & Royse PLLC  
176 Pasadena Drive, Building I  
Lexington, KENTUCKY 40503

\*Honorable James M Miller  
Attorney at Law  
Sullivan, Mountjoy, Stainback & Miller, PSC  
100 St. Ann Street  
P.O. Box 727  
Owensboro, KENTUCKY 42302-0727

\*William H May, III  
Hurt, Deckard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Dan H McCrary  
Balch & Bingham, LLP  
1710 Sixth Ave. North  
Birmingham, ALABAMA 35203

\*Jake A Thompson  
Crawford & Baxter, P.S.C. Attorneys at Law  
523 Highland Avenue  
P. O. Box 353  
Carrollton, KENTUCKY 41008

\*Bradley Cherry  
Grayson R.E.C.C.  
109 Bagby Park  
Grayson, KY 41143

\*Farmers R.E.C.C.  
Farmers R.E.C.C.  
504 South Broadway  
P. O. Box 1298  
Glasgow, KY 42141-1298

\*Jesse S Unkenholz  
Balch & Bingham, LLP  
1710 Sixth Ave. North  
Birmingham, ALABAMA 35203

\*Brandon Music  
W. Jeffrey Scott, PSC  
PO Box 608  
Grayson, KENTUCKY 41143

\*Honorable James M Crawford  
Crawford & Baxter, P.S.C. Attorneys at Law  
523 Highland Avenue  
P. O. Box 353  
Carrollton, KENTUCKY 41008

\*Kent Chandler  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Carol Hall Fraley  
President & CEO  
Grayson R.E.C.C.  
109 Bagby Park  
Grayson, KY 41143

\*John Douglas Hubbard  
Fulton, Hubbard & Hubbard  
117 E. Stephen Foster Avenue  
P.O. Box 88  
Bardstown, KENTUCKY 40004

\*Nolin R.E.C.C.  
Nolin R.E.C.C.  
411 Ring Road  
Elizabethtown, KY 42701-6767

\*Clayton O Oswald  
Taylor, Keller & Oswald, PLLC  
1306 West Fifth Street, Suite 100  
Post Office Box 3440  
London, KENTUCKY 40743-3440

\*Jason Floyd  
Fulton, Hubbard & Hubbard  
117 E. Stephen Foster Avenue  
P.O. Box 88  
Bardstown, KENTUCKY 40004

\*South Kentucky R.E.C.C.  
925-929 N Main Street  
P. O. Box 910  
Somerset, KY 42502-0910

\*Honorable David A Smart  
Attorney at Law  
East Kentucky Power Cooperative, Inc.  
P. O. Box 707  
Winchester, KY 40392-0707

\*Fleming-Mason Energy Cooperative, In  
Fleming-Mason Energy Cooperative, Inc.  
1449 Elizaville Road  
P. O. Box 328  
Flemingsburg, KY 41041

\*Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

\*Steven M Madison  
Balch & Bingham, LLP  
1710 Sixth Ave. North  
Birmingham, ALABAMA 35203

\*Inter-County Energy Cooperative Corp  
Inter-County Energy Cooperative Corporation  
1009 Hustonville Road  
P. O. Box 87  
Danville, KY 40423-0087

\*Scott B Grover  
Balch & Bingham, LLP  
1710 Sixth Ave. North  
Birmingham, ALABAMA 35203

\*Honorable Matthew R Malone  
Attorney at Law  
Hurt, Deekard & May  
The Equus Building  
127 West Main Street  
Lexington, KENTUCKY 40507

\*Jackson Energy Cooperative Corporati  
Jackson Energy Cooperative Corporation  
115 Jackson Energy Lane  
McKee, KY 40447

\*Ted Hampton  
General Manager  
Cumberland Valley Electric, Inc.  
Highway 25E  
P. O. Box 440  
Gray, KY 40734

\*R. Michael Sullivan  
Sullivan, Mountjoy, Stainback & Miller, PSC  
100 St. Ann Street  
P.O. Box 727  
Owensboro, KENTUCKY 42302-0727

\*Licking Valley R.E.C.C.  
Licking Valley R.E.C.C.  
P. O. Box 605  
271 Main Street  
West Liberty, KY 41472

\*Honorable W. Jeffrey Scott  
Attorney At Law  
P.O. Box 608  
311 West Main Street  
Grayson, KENTUCKY 41143

\*Honorable W. Patrick Hauser  
Attorney At Law  
P. O. Box 1900  
Barbourville, KENTUCKY 40906

\*Honorable Ruth H Baxter  
Attorney at Law  
Crawford & Baxter, P.S.C. Attorneys at Law  
523 Highland Avenue  
P. O. Box 353  
Carrollton, KENTUCKY 41008

\*Blue Grass Energy Cooperative Corp.  
Blue Grass Energy Cooperative Corp.  
1201 Lexington Road  
P. O. Box 990  
Nicholasville, KY 40340-0990

\*Rebecca W Goodman  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Clark Energy Cooperative, Inc.  
Clark Energy Cooperative, Inc.  
2640 Ironworks Road  
P. O. Box 748  
Winchester, KY 40392-0748

\*Roger R Cowden  
Senior Corporate Counsel  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*East Kentucky Power Cooperative, Inc  
East Kentucky Power Cooperative, Inc.  
4775 Lexington Road  
P. O. Box 707  
Winchester, KY 40392-0707

\*Robert Spragens, Jr.  
Spragens & Higdon, P.S.C.  
15 Court Square  
P.O. Box 681  
Lebanon, KENTUCKY 40033